

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re DYNAMIC RANDOM ACCESS  
MEMORY (DRAM) ANTITRUST  
LITIGATION,

No. M-02-1486 PJH (JCS)

**AMENDMENT NO. 1 TO  
DISCOVERY PLAN**

This document relates to:

ALL ACTIONS.

TO ALL PARTIES AND COUNSEL OF RECORD:

Pursuant to the agreement of counsel, the Discovery Plan is amended as follows:

1. The direct and indirect plaintiffs collectively may depose up to 75 percipient witnesses as part of the joint, coordinated discovery in this case, subject to the limitation in Paragraph 2 below.
2. The direct and indirect plaintiffs collectively may depose up to 15 current or former employees of each Defendant Group. For this purpose, defendants that are part of the same corporate family constitute a single Defendant Group, so for example Hynix Semiconductor, Inc. and Hynix Semiconductor America, Inc. constitute a single Defendant Group and likewise Micron Technology, Inc., Micron Semiconductor Products, Inc., and Crucial Technology, Inc. constitute a single Defendant Group.
3. The defendants collectively may take up to 40 depositions, in addition to the depositions of class representatives.

1           4.       The direct and indirect plaintiffs collectively may take up to 14 hours of 30(b)(6)  
2               depositions of each Defendant Group as part of the joint, coordinated discovery. The  
3               parties are meeting and conferring about 30(b)(6) topics and witnesses.

4           5.       The defendants and counsel for the indirect purchaser plaintiffs will meet and confer  
5               on limits for separate depositions on issues unique to the indirect purchaser claims.

6       IT IS SO ORDERED.

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8       Dated: March 9, 2006

  
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JOSEPH C. SPERO  
United States Magistrate Judge